

Olivier A. Beabeau (#020986)
Keith R. Galbut (#022869)
Charles J. Morrow (#026322)
GALBUT & GALBUT, P.C.
2425 East Camelback Road, Suite 1020
Phoenix, Arizona 85016
Phone: 602.955.1455
Fax: 602.955.1585
doCKET@galbutlaw.com
Attorneys for Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA**

In re:

SOUTHPLACE (AMERICA) LLP, a limited
liability partnership incorporated in the
United Kingdom,

Debtor in a foreign proceeding

Chapter 15

Case No. 2:10-bk-33724

**APPLICATION FOR RECOGNITION
OF FOREIGN MAIN PROCEEDING**

Andrew James Davison and Colin Peter Dempster of Ernst & Young LLP (collectively, "Trustee") are the duly appointed administrators and the foreign representatives of Southplace (America) LLP, a limited liability partnership incorporated in the United Kingdom ("Debtor"). On December 24, 2009, pursuant to Schedule B1 to the Insolvency Act 1986 and Rule 2.16 of the Insolvency (Scotland) Rules 1986, and subject to the approval of the Court of Session, Debtor appointed Trustee as its administrator (the "UK Proceeding"). Trustee, by and through the undersigned, files this petition (the "Chapter 15 Petition") pursuant to Chapter 15 of the United States Bankruptcy Code (the "Bankruptcy Code") in furtherance of the Official Form 1 petition filed contemporaneously herewith seeking: (1) recognition of the UK Proceeding as a "foreign main proceeding"; (2) an order granting additional relief upon recognition; and (3) an order approving the notice and manner of service and setting a hearing date on the Chapter 15 Petition.

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1 Chartered Accountant, together with exhibits (“Trustee’s Declaration”) is filed
2 contemporaneously herewith and incorporated herein by reference.

3 8. The Foreign Representative’s Rule 1007(a)(4) List of Administrators,
4 Litigation Parties, and Entities Against Whom Provisional Relief is Sought, also signed under
5 penalty of perjury by Andrew James Davison, Chartered Accountant (the “Chapter 15 List”)
6 is filed contemporaneously herewith and incorporated herein by reference.

7 9. Trustee’s Declaration recites the facts pertinent and necessary to sustain the
8 request for recognition of the UK Proceeding as a foreign main proceeding pursuant to
9 Sections 1515 and 1517 of the Bankruptcy Code, and for additional relief available upon
10 recognition pursuant to Section 1521 of the Bankruptcy Code, including, without limitation,
11 evidence that:

12 a. The UK Proceeding is a “foreign proceeding” within the meaning of
13 Section 101(23) that was duly commenced and is proceeding in Edinburgh, Scotland,
14 and has been duly authorized and sanctioned by the Court of Session;

15 b. The UK Proceeding is the only foreign proceeding with respect to
16 Debtor of which Trustee has knowledge;

17 c. The registered office and principal place of business or “center of main
18 interests” of Debtor is in Edinburgh, Scotland;

19 d. Trustee, as administrator of Debtor in the UK Proceeding, is duly
20 authorized to act as the foreign representative of Debtor and is duly authorized to file
21 the petition for relief under Chapter 15, and

22 e. Trustee is entitled to the relief requested in this Chapter 15 Petition on
23 behalf of Debtor.

24 10. Trustee’s Declaration also recites under penalty of perjury the facts and
25 circumstances surrounding the UK Proceeding and the commencement of this Chapter 15
26 case, the substance of which is repeated herein for convenience.

1 11. Debtor is a limited liability partnership organized and existing under the laws
2 of the United Kingdom. Debtor's registered office is Ten George Street, Edinburgh, EH2
3 2DZ.

4 12. On December 14, 2009, Debtor filed its Notice of Intention to Appoint an
5 Administrator by Limited Liability Partnership in the Court of Session (the "Notice of
6 Intent"). The Notice of Intent was endorsed by the Court of Session on December 14, 2009.
7 A copy of the Notice of Intent is attached as Exhibit "A" to Trustee's Declaration.

8 13. On December 24, 2009, Debtor filed its Notice of Appointment of an
9 Administrator by Limited Liability Partnership in the Court of Session (the "Notice of
10 Appointment"). The Notice of Appointment was endorsed by the Court of Session on
11 December 24, 2009. A copy of the Notice of Appointment is attached as Exhibit "B" to
12 Trustee's Declaration.

13 14. Pursuant to the Notice of Appointment, Trustee was appointed the
14 administrator of Debtor.

15 15. Pursuant to Scottish law, all assets of Debtor have vested in Trustee, and there
16 is a stay of proceedings in effect. All creditors of Debtor are treated equally in the sense that
17 non-Scottish creditors are accorded the same priority and are otherwise provided with the
18 same treatment as Scottish Creditors.

19 16. Debtor's principal place of business and "center of main interest" is in
20 Edinburgh, Scotland. Debtor has no assets outside of Scotland other than the assets located
21 in Maricopa County, Arizona (the "Arizona Assets"). All of Debtor's business records are in
22 Edinburgh, Scotland, and all its members are located in the United Kingdom.

23 17. On or about February 3, 2006, Debtor purchased real property ("Lot 165") in
24 Maricopa County, Arizona legally described as follows:

25 Lot 165, of DESERT MOUNTAIN PHASE II APACHE PEAK, PART
26 FOUR, according to the plat of record in the office of the County Recorder of
 Maricopa County, Arizona, recorded in Book 396 of Maps, page 29.

1 18. On or about February 3, 2006, Debtor purchased real property ("Lot 42") in
2 Maricopa County, Arizona legally described as follows:

3 Lot Forty-two (42), of DESERT MOUNTAIN PHASE II, UNIT EIGHTEEN
4 (THE VILLAGES OF PAINTED SKY), according to the plat of record in the
5 office of the County Recorder of Maricopa County, Arizona, recorded in Book
6 408 of Maps, page 6.

7 19. On or about February 14, 2006, Debtor, as trustor, executed a deed of trust (the
8 "Deed of Trust") in favor of The Governor and Company of the Bank of Scotland ("Bank of
9 Scotland"), as beneficiary, for Lot 165.

10 20. The Deed of Trust was recorded with the Maricopa County Recorder's Office
11 on February 14, 2006 at recording number 2006-0208395.

12 21. On or about May 9, 2006, Debtor executed a supplement to the Deed of Trust
13 extending the lien of the Deed of Trust to cover Lot 42.

14 22. The supplement to the Deed of Trust was recorded with the Maricopa County
15 Recorder's Office on May 15, 2006 at recording number 2006-0656956.

16 23. The Arizona Assets are comprised entirely of Lot 165, Lot 42, and a potential
17 claim relating to fire damage to Lot 42 in December, 2007.

18 24. Bank of Scotland is a secured creditor of Debtor with a properly perfected
19 security interest in the Arizona Assets.

20 25. As of October 11, 2010, Debtor owes Bank of Scotland approximately
21 \$1,600,000.00, not including interest and other charges accruing from December 24, 2009.

22 26. On or about August 27, 2009, The Desert Mountain Master Association
23 ("Desert Mountain") filed a lawsuit (the "Arizona Action") against Debtor for breach of
24 contract, declaratory judgment, and injunctive relief relating to Debtor's alleged failure to
25 comply with the Amended and Restated Master Declaration of Covenants, Conditions,
26 Restrictions, Assessments, Charges, Servitudes, Liens, Reservations and Easement for Desert
Mountain (the "Master Declaration") and Declaration of Covenants, Conditions, Restrictions

1 and Easement for Desert Mountain, Phase II, Unit Eighteen (The Village of Painted Sky) (the
2 “Village Declaration”).

3 27. The Arizona Action is pending before the Maricopa County Superior Court,
4 case number CV2009-027510.

5 28. A Settlement Conference is scheduled in the Arizona Action for October 27,
6 2010.

7 29. The UK Proceeding is the only “foreign proceeding” with respect to Debtor.

8 30. Debtor has fewer than ten creditors in Scotland with claims in excess of
9 \$1,900,000.00.

10 31. Trustee is required to administer the payment of the creditors as required under
11 Scottish insolvency law.

12 32. Upon information and belief, there are no creditors of Debtor in the United
13 States, except for:

- 14 a. Desert Mountain;
- 15 b. City of Scottsdale which is owed approximately \$20,507.00; and
- 16 c. Maricopa County Treasurer which is owed approximately \$24,124.15.

17 33. Although no claims regarding the following have been intimated to Trustee to
18 date, the following may be creditors of Debtor in the United States:

- 19 a. Ruben Hernandez, Financial Services Customer Service;
- 20 b. HIG Consulting;
- 21 c. All Pro Fence Co.; and
- 22 d. Advanced Mobile Storage.

23 34. The ultimate goal of Trustee is to ensure an orderly administration of the
24 financial affairs of Debtor and to maximize the value of Debtor’s assets to be distributed to
25 all creditors, under the auspices of Scottish law, and with the aid of this Court as requested
26 herein.

1 35. Trustee believes that granting the relief sought in the Chapter 15 Petition will
2 best afford (and may be the only way to assure), the equitable collection, liquidation, and
3 distribution to creditors in the United States and Scotland.

4 **REQUEST FOR AN ENTRY OF ORDER GRANTING**

5 **RECOGNITION AND ADDITIONAL RELIEF**

6 36. Chapter 15 of the Bankruptcy Code was specifically designed to assist foreign
7 representatives such as Trustee in the performance of their duties. One of its express
8 objectives stated in Section 1501(a)(3) is the “fair and efficient administration of cross-border
9 insolvencies that protects the interests of all creditors, and other interested entities, including
10 the debtor.”

11 37. The UK Proceeding and Trustee are entitled to recognition under Section 1517
12 of the Bankruptcy Code because the UK Proceeding is a foreign proceeding within the
13 meaning of Section 101(23) in that assets of Debtor are under the supervision and control of
14 Trustee as appointed in the UK Proceeding pursuant to Scottish insolvency laws.

15 38. The UK Proceeding is a foreign main proceeding within the meaning of
16 Section 1502(4) because Debtor’s registered office and principal place of business are
17 located in Edinburgh, Scotland.

18 39. Edinburgh, Scotland is Debtor’s center of main interests within the meaning of
19 Section 1516(c).

20 40. Trustee is a foreign representative within the meaning of Section 101(24).

21 41. This Chapter 15 Petition meets the requirements of Section 1515.

22 42. Recognizing the UK Proceeding as a foreign main proceeding would not be
23 manifestly contrary to the public policy of the United States under Section 1506.

24 43. Granting recognition of the UK Proceeding as a foreign main proceeding will
25 promote the public policy of the United States of respecting foreign proceedings as
26 articulated in, among other statutory provisions, Sections 1501(a) and 1508.

1 44. The conditions for mandatory recognition of Trustee and the UK Proceeding
2 under Section 1517 have been satisfied.

3 45. Trustee seeks recognition of the UK Proceeding as a foreign main proceeding
4 and hereby seeks entry of an order of this Court, substantially in the form of the proposed
5 order attached hereto as Exhibit “1” (the “Proposed Recognition Order”) granting the
6 following relief in support of the UK Proceeding:

7 a. Recognition of the UK Proceeding as a “foreign main proceeding” as
8 defined in Section 1502(4) pursuant to Section 1517;

9 b. Recognition of Trustee as the “foreign representative” of Debtor within
10 the meaning of Section 101(24) for all purposes under Chapter 15;

11 c. Granting all relief afforded foreign main proceedings automatically
12 upon recognition pursuant to Section 1520, including the “automatic stay” under
13 Section 362; and

14 d. Granting additional relief pursuant to Sections 1521(a)(5) and 1521(b)
15 entrusting the administration, realization, and distribution of Debtor’s assets located in
16 the United States, including the Arizona Assets, to Trustee in the UK Proceeding.

17 **REQUEST FOR AN ORDER SPECIFYING THE FORM AND MANNER OF**
18 **SERVICE AND SCHEDULING A HEARING ON THE CHAPTER 15 PETITION**

19 46. Trustee respectfully requests that the Court approve the notice and manner of
20 service of the notice of the Chapter 15 Petition pursuant to Bankruptcy Rules 9007 and
21 2002(q)(1), and that the Court set a hearing date on the Chapter 15 Petition.

22 47. Trustee seeks an entry of an order of this Court, substantially in the form of the
23 proposed order attached as Exhibit “2” attached hereto (the “Proposed Notice and Scheduling
24 Order”) which (1) approves the notice of the Chapter 15 Petition substantially in the form
25 attached hereto as Exhibit “3” (the “Proposed Notice”); and (2) specifies the manner of
26

1 service of the Proposed Notice; and (3) sets the date for the hearing on the entry of the order
2 of recognition of the UK Proceeding.

3 48. Pursuant to Bankruptcy Rule 2002(q)(1), Trustee requests that service of the
4 Proposed Notice, the Chapter 15 Petition, and related documents, including any order
5 granting provisional relief (the "Service Documents") by U.S. mail, first class postage
6 prepaid, overnight courier, electronic transmission, or by facsimile transmission upon Debtor,
7 all known creditors, and all other parties against whom relief is sought, including "litigation
8 parties" or their counsel identified in the Chapter 15 List on or before a date to be set by the
9 Court, be approved as adequate and sufficient notice of the Service Documents and the relief
10 sought therein. The service will be done by Trustee or its counsel rather than the Clerk of the
11 Court.

12 49. Trustee requests that the Court set a hearing on the Chapter 15 Petition on a
13 date approximately 20 days after service as provided for in Bankruptcy Rule 2002(q)(1).

14 50. Trustee requests that the Court also require that any responses to the Chapter
15 15 Petition (or other Service Documents) must be made in writing describing the basis
16 therefore and be filed with the Court electronically and served upon Trustee's counsel at the
17 address indicated above at least (2) business days prior to the hearing date.

18 WHEREFORE, Trustee respectfully requests this Court enter orders:

19 A. Recognizing the UK Proceeding as a foreign main proceeding;

20 B. Granting additional relief upon recognition;

21 C. Approving the notice and manner of service and setting a hearing date on the
22 Chapter 15 Petition; and

23 D. Granting such other and further relief as the Court deems proper and equitable
24 under the circumstances.

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RESPECTFULLY SUBMITTED this 20th day of October, 2010.

GALBUT & GALBUT, P.C.

By: Keith R. Galbut
Olivier A. Beabeau, Esq.
Keith R. Galbut, Esq.
Charles J. Morrow, Esq.
Attorneys for Trustee

NOTICE OF ELECTRONIC FILING

I hereby certify that on October 20, 2010, I electronically filed the foregoing with the Clerk of Court for filing and uploading to the CM/ECF system which will send notification of such filing to all parties of record.

/s/ Charles J. Morrow

EXHIBIT “1”

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7 **IN THE UNITED STATES BANKRUPTCY COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 In re:

10 SOUTHPLACE (AMERICA) LLP, a limited
11 liability partnership incorporated in the
United Kingdom,

12 Debtor in a foreign proceeding
13

Chapter 15

Case No. 2:10-bk-33724

**ORDER RECOGNIZING FOREIGN
MAIN PROCEEDING**

14 WHEREAS, Andrew James Davison and Colin Peter Dempster of Ernst & Young
15 LLP (collectively, "Trustee") are the duly appointed administrators and the foreign
16 representatives of Southplace (America) LLP, a limited liability partnership incorporated
17 in the United Kingdom ("Debtor");

18 WHEREAS, on December 24, 2009, pursuant to Schedule B1 to the Insolvency Act
19 1986 and Rule 2.16 of the Insolvency (Scotland) Rules 1986, and subject to the approval
20 of the Court of Session, Debtor appointed Trustee as its administrator (the "UK
21 Proceeding");

22 WHEREAS, Trustee, by and through its United States Counsel, Galbut & Galbut,
23 P.C., filed a petition (the "Chapter 15 Petition") pursuant to Chapter 15 of the United
24 States Bankruptcy Code (the "Bankruptcy Code") commencing this Chapter 15 case
25 ancillary to the UK Proceeding seeking: (1) recognition of the UK Proceeding as a
26 "foreign main proceeding"; (2) an order granting additional relief upon recognition; and

1 (3) an order approving the notice and manner of service and setting a hearing date on the
2 Chapter 15 Petition;

3 WHEREAS, due and timely notice of the filing of the Chapter 15 Petition having
4 been given pursuant to an order of this Court, and which notice is deemed adequate for all
5 purposes and no other or further notice need be given;

6 WHEREAS, a hearing was held before this Court on _____, 2010
7 to consider the Chapter 15 Petition, and the Court having considered and reviewed all
8 pleadings and exhibits submitted by Trustee in support of the Chapter 15 Petition, and no
9 objection or response having been filed that has not been withdrawn, overruled, or
10 otherwise resolved, and all interested parties having had an opportunity to be heard, and
11 the Court having heard argument by counsel appearing at the hearing, and after due
12 deliberation and sufficient cause appearing therefore, the Court finds and concludes as
13 follows:

14 A. Debtor is subject to a pending foreign proceeding within the meaning of
15 Section 101(23) of the Bankruptcy Code;

16 B. Debtor is subject to a pending foreign main proceeding within the meaning
17 of Section 1502(4) of the Bankruptcy Code;

18 C. Trustee is the foreign representative of Debtor within the meaning of Section
19 101(24) of the Bankruptcy Code;

20 D. The Chapter 15 case was properly commenced pursuant to Sections 1504
21 and 1515 of the Bankruptcy Code;

22 E. The Chapter 15 Petition satisfied the requirements of Section 1515 of the
23 Bankruptcy Code.

24 F. Trustee is entitled to all relief provided pursuant to Section 1520 of the
25 Bankruptcy Code without limitation;
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1 G. Trustee is entitled to additional relief provided pursuant to Sections
2 1521(a)(5) and 1521(b) of the Bankruptcy Code entrusting the administration, realization,
3 and distribution of Debtor's assets located in the United States to Trustee in the UK
4 Proceeding;

5 H. The relief granted hereby is necessary and appropriate, in the interest of the
6 public and international comity, consistent with the public policy of the United States,
7 warranted pursuant to Sections 1520 and 1521 of the Bankruptcy Code, and will not cause
8 hardship to plaintiff in the litigation against Debtor, Trustee, or other parties in interest that
9 is not outweighed by the benefits of granting that relief;

10 I. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and

11 J. Venue is proper in this district pursuant to 28 U.S.C. § 1410.

12 NOW THEREFORE, IT IS HEREBY ORDERED THAT:

13 1. The UK Proceeding is granted recognition pursuant to Section 1517(a) of the
14 Bankruptcy Code;

15 2. The UK Proceeding is granted recognition as a foreign main proceeding
16 pursuant to Section 1517(b)(1) of the Bankruptcy Code;

17 3. All relief afforded a foreign main proceeding pursuant to Section 1520 of the
18 Bankruptcy Code is granted without limitation;

19 4. The automatic stay of Section 362 of the Bankruptcy Code applies with respect
20 to Debtor and the property of Debtor that is within the territorial jurisdiction of the United
21 States;

22 5. Additional relief pursuant to Sections 1521(a)(5) and 1521(b) entrusting the
23 administration, realization, and distribution of Debtor's assets located in the United States to
24 Trustee in the UK Proceeding is granted;

6. This Order shall be served upon all known creditors (or their counsel) of Debtor by electronic mail or by facsimile transmission or by U.S. mail, first class postage prepaid or overnight courier on or before _____; and

7. Service in accordance with this Order shall constitute adequate and sufficient service and notice.

DATED this ____ day of _____, 2010.

By: _____
United States Bankruptcy Judge

EXHIBIT “2”

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7 **IN THE UNITED STATES BANKRUPTCY COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 In re:

10 SOUTHPLACE (AMERICA) LLP, a limited
11 liability partnership incorporated in the
United Kingdom,

12 Debtor in a foreign proceeding
13

Chapter 15

Case No. 2:10-bk-33724

**ORDER SCHEDULING HEARING
AND SPECIFYING THE FORM AND
MANNER OF SERVICE OF
CHAPTER 15 PETITION**

14 WHEREAS, Andrew James Davison and Colin Peter Dempster of Ernst & Young
15 LLP (collectively, "Trustee") are the duly appointed administrators and the foreign
16 representatives of Southplace (America) LLP, a limited liability partnership incorporated
17 in the United Kingdom ("Debtor");

18 WHEREAS, on December 24, 2009, pursuant to Schedule B1 to the Insolvency Act
19 1986 and Rule 2.16 of the Insolvency (Scotland) Rules 1986, and subject to the approval
20 of the Court of Session, Debtor appointed Trustee as its administrator (the "UK
21 Proceeding");

22 WHEREAS, Trustee, by and through its United States Counsel, Galbut & Galbut,
23 P.C., filed a petition (the "Chapter 15 Petition") pursuant to Chapter 15 of the United
24 States Bankruptcy Code (the "Bankruptcy Code") commencing this Chapter 15 case
25 ancillary to the UK Proceeding seeking: (1) recognition of the UK Proceeding as a
26 "foreign main proceeding"; (2) an order granting additional relief upon recognition; and

1 (3) an order approving the notice and manner of service and setting a hearing date on the
2 Chapter 15 Petition;

3 NOW THEREFORE, IT IS HEREBY ORDERED THAT:

4 1. A hearing on the relief requested in the Chapter 15 Petition will be heard on
5 _____, 2010, at _____ (Arizona time), or soon thereafter as
6 counsel may be heard, in Room _____ of the United States Bankruptcy Court, located at
7 230 North First Avenue, Suite 101, Phoenix, Arizona 85003;

8 2. The form of Proposed Notice attached to the Chapter 15 Petition is approved;

9 3. Copies of the Notice, Chapter 15 Petition, and the related documents filed in
10 support thereof (the "Service Documents") will be served by U.S. mail, first class postage
11 prepaid, overnight courier, electronic transmission, or facsimile transmission upon Debtor, all
12 known creditors, and all other parties against whom relief is sought, including "litigation
13 parties" or their counsel identified in the Foreign Representative's Rule 1007(a)(4) List of
14 Administrators, Litigation Parties and Entities Against Whom Provisional Relief is Sought on
15 or before _____, in accordance with Bankruptcy Rules 2002(q)(1) and
16 9007. The service will be done by Trustee or its counsel rather than the Clerk of the Court;

17 4. Service pursuant to this order is good and sufficient service and adequate
18 notice of the hearing to consider the Chapter 15 Petition and the request for an order granting
19 recognition of the UK Proceeding as a foreign main proceeding and for additional relief; and

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5. Any objection or response to the Chapter 15 Petition (or other Service Documents) must be made in writing describing the basis therefore and must be filed with the Court electronically and served on Trustee's counsel, Galbut & Galbut, P.C., 2425 East Camelback Road, Suite 1020, Phoenix, Arizona 85016 at least two business days prior to the hearing date.

DATED this ____ day of _____, 2010.

By: _____
United States Bankruptcy Judge

EXHIBIT “3”

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7 **IN THE UNITED STATES BANKRUPTCY COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 In re:

10 SOUTHPLACE (AMERICA) LLP, a limited
11 liability partnership incorporated in the
United Kingdom,

12 Debtor in a foreign proceeding
13

Chapter 15

Case No. 2:10-bk-33724

**NOTICE OF FILING AND HEARING
ON PETITION UNDER CHAPTER 15
OF THE UNITED STATES
BANKRUPTCY CODE**

14 PLEASE TAKE NOTICE that Andrew James Davison and Colin Peter Dempster
15 of Ernst & Young LLP (collectively, "Trustee") are the duly appointed administrators and
16 the foreign representatives of Southplace (America) LLP, a limited liability partnership
17 incorporated in the United Kingdom ("Debtor").

18 PLEASE TAKE NOTICE that on December 24, 2009, pursuant to Schedule B1 to
19 the Insolvency Act 1986 and Rule 2.16 of the Insolvency (Scotland) Rules 1986, and
20 subject to the approval of the Court of Session, Debtor appointed Trustee as its
21 administrator (the "UK Proceeding").

22 PLEASE TAKE NOTICE that Trustee, by and through its United States Counsel,
23 Galbut & Galbut, P.C., filed a petition (the "Chapter 15 Petition") pursuant to Chapter 15
24 of the United States Bankruptcy Code (the "Bankruptcy Code") commencing this Chapter
25 15 case ancillary to the UK Proceeding seeking: (1) recognition of the UK Proceeding as a
26 "foreign main proceeding"; (2) an order granting additional relief upon recognition; and

1 (3) an order approving the notice and manner of service and setting a hearing date on the
2 Chapter 15 Petition.

3 PLEASE TAKE NOTICE that the United States Bankruptcy Court for the District
4 of Arizona has set a hearing on the Chapter 15 Petition and the requests contained in the
5 Petition for _____, 2010, at _____ (Arizona time), or soon
6 thereafter as counsel may be heard, in Room _____ of the United States Bankruptcy Court,
7 located at 230 North First Avenue, Suite 101, Phoenix, Arizona 85003.

8 PLEASE TAKE NOTICE that any party wishing to submit an objection or response
9 to the Chapter 15 Petition or the relief requested in the Chapter 15 Petition must do so in
10 writing describing the basis therefore, and such objection or response must be filed with the
11 Court and served on Trustee's counsel, Galbut & Galbut, P.C., 2425 East Camelback Road,
12 Suite 1020, Phoenix, Arizona 85016 at least two business days prior to the hearing date.

13 PLEASE TAKE NOTICE that all parties opposed to the Chapter 15 Petition and
14 the relief requested therein must appear at the hearing at the time and place set forth
15 above. If no objection or response is timely filed and served as provided above, the
16 Bankruptcy Court may grant the recognition and relief requested by Trustee without
17 further notice.

18 DATED this ____ day of _____, 2010.

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20 By: _____
21 United States Bankruptcy Judge
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